

January 30, 1992

SDMS Document



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Mr. Dennis Hart  
Administrator, Wastewater Facilities Regulation  
New Jersey Department of Environmental Protection  
Bureau of Industrial Discharge Permits  
CN-029  
Trenton, New Jersey 08625

**RE: Draft SIU Permit - NJPDES No. NJ0081507  
Former Hexcel Corporation Facility; Lodi, NJ**

Dear Mr. Hart:

The following comments are submitted in response to the Public Notice regarding the draft New Jersey Pollutant Discharge Elimination System (NJPDES)/Significant Indirect User (SIU) Permit issued to Hexcel Corporation (NJPDES-SIU Permit No. NJ0085107).

**Comment No. 1**

The property owner is incorrectly listed on the draft permit as Hexcel Corporation. Hexcel Corporation is the owner of the ground water treatment system only. Fine Organics Corporation is the property owner. The permit should be modified to reflect the correct property owner.

**Comment No. 2**

As indicated in the "SIU Permit Summary Table - Statement of Basis", certain discharge limitations were derived from a synthesis of the most stringent limitations from the National Categorical Pretreatment Standards for Metal Finishing, Electroplating, and Inorganic Chemicals Manufacturing Point Source Categories. The monthly average discharge limitations for copper, lead, and zinc presented in the permit are more stringent than the federal drinking water

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standards, or Maximum Contaminant Levels (MCLs), for these metals. The presence of metals in ground water at the facility appear to be solely a result of contact with minerals in the soil. Metals have not been identified as parameters of concern in ground water at the facility, and the ground water treatment system does not include a treatment unit for metals reduction. It is requested that the monthly average discharge limitations for copper, lead, and zinc be changed to the respective MCLs for these metals.

Please let me know if you have any questions regarding these comments.

Sincerely,



A. William Nosil  
Corporate Environmental Engineering Manager

cc: Gary Sanderson; NJDEP  
Frank D'Ascensio; PVSC  
Lisa Bromberg; Porzio, Bromberg & Newman  
Rob Powell; ENVIRON  
Joe Ritchey; Heritage Remediation/Engineering, Inc.

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